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15 Attorneys for  
16 MOJAVE SOLAR, LLC

17  
18 **UNITED STATES BANKRUPTCY COURT**  
19 **NORTHERN DISTRICT OF CALIFORNIA**  
20 **SAN FRANCISCO DIVISION**

21 **In re:**

Bankruptcy Case

No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

22 **PG&E CORPORATION**

23 **-and-**

24 **PACIFIC GAS AND ELECTRIC**  
25 **COMPANY,**

26 **Debtors.**

**JOINDER TO NEXTERA ENERGY'S  
LIMITED OPPOSITION TO MOTION  
OF THE UTILITY FOR LIMITED  
RELIEF FROM THE AUTOMATIC  
STAY TO APPEAL CERTAIN  
MATTERS PENDING BEFORE THE  
FEDERAL ENERGY REGULATORY  
COMMISSION**

27 ☐ Affects PG&E Corporation  
28 ☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).

Date: June 26, 2019  
Time: 9:30 a.m. (PST)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

**Objection Deadline:** June 19, 2019  
4:00 p.m. (PST)

**JOINDER TO NEXTERA ENERGY'S LIMITED  
OPPOSITION TO MOTION OF THE UTILITY  
FOR LIMITED RELIEF FROM THE AUTOMATIC**

**CASE No: 19-30088 (DM)**

1 Mojave Solar LLC ( “**Mojave**”) hereby joins (this “**Joinder**”) in the limited opposition of  
2 NextEra Energy, Inc. and NextEra Energy Partners, L.P. (collectively, “**NextEra**”) [Docket No  
3 2616] (the “**NextEra Stay Objection**”) to the Motion of the Utility for Limited Relief from the  
4 Automatic Stay to Appeal Certain Matters Pending Before the Federal Energy Regulatory  
5 Commission [[Docket No. 2359] (the “**Utility Stay Motion**”).<sup>1</sup>

6 For the reasons set forth in the NextEra Stay Objection as well as NextEra’s Motion for  
7 Limited Relief from Stay to Participate in Appellate Proceedings with Respect to FERC Orders  
8 [Docket No. 2400] (the “**NextEra Stay Motion**”),<sup>2</sup> Mojave respectfully requests that the Court  
9 deny the prospective relief requested in the Debtor Stay Motion unless it also enters an order  
10 granting the NextEra Stay Motion (or incorporates the relief requested therein into its order on the  
11 Utility Stay Motion).

#### 12 **NOTICE**

13 Notice of this Joinder will be provided to (i) the Office of the U.S. Trustee for Region 17  
14 (Attn: Anthony R. Vara, Esq. and Timothy Laffredi, Esq.); (ii) counsel to the Debtors; (iii) counsel  
15 to the Creditors Committee; (iv) counsel to the Tort Claimants Committee; (v) the Securities and  
16 Exchange Commission; (vi) the Internal Revenue Service; (vii) the Office of the California  
17 Attorney General; (viii) the California Public Utilities Commission; (ix) the Nuclear Regulatory  
18 Commission; (x) the Federal Energy Regulatory Commission; (xi) the Office of the United States  
19 Attorney for the Northern District of California; (xii) counsel for the agent under the Debtors’  
20 debtor-in-possession financing facility; (xiii) counsel to the PPA Counterparties; and (xiv) those  
21 persons who have formally appeared in these chapter 11 cases and requested service pursuant to  
22 Bankruptcy Rule 2002.

23 Mojave respectfully submits that no further notice is required.

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25  
26 <sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to  
them in the Debtor Stay Motion.

27 <sup>2</sup> Mojave also joined the NextEra Stay Motion at Docket No. 2452 and hereby incorporates  
by reference all arguments made therein.

1 DATED: June 19, 2019

2 SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

3  
4 By: /s/ Amy S. Park

5 Amy S. Park  
6 Attorneys for  
7 MOJAVE SOLAR LLC  
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